

Post-Review Implementation Plan – 2022 - South Hedland Power Station

Ref#	Licence Obligation	Auditor's recommendation	Action Proposed to be taken by the Licensee	Responsible Person(s)	Target Completion Date
1/2022	<p>Asset Maintenance</p> <p><i>Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.</i></p> <p>Through discussion with the O&M Supervisor for South Hedland Power Station (SHPS), a review of relevant supporting documentation and a site visit, the reviewer determined:</p> <ul style="list-style-type: none"> • TEC Hedland has a corrective and preventative maintenance plans for all its assets at SHPS. • Maintenance is managed through a front-end dashboard to SAP and all corrective, preventative and compliance maintenance activities are included in the maintenance schedules. • All major maintenance, including capital works, is planned by the maintenance planner according to the TransAlta MRF and budgeting processes. • Maintenance staff visit the site every day and conduct inspection rounds. • Remote support is also available as TEC Hedland's operations systems can be logged into remotely. <p>It was noted that there were over 120 overdue preventative maintenance tasks with budgeted hours of 2,691 and the low preventative maintenance metrics (over 35% below target) is indicative of Maintenance Plans not being suitable and/or not being completed on schedule.</p>	<p>TEC Hedland to review the overdue preventative maintenance tasks at SHPS and reassess priorities and review the adequacy of staffing levels.</p>	<p>For contextualizing the actions, it is worth noting that TEC Hedland has a progressive work management process in place (GAS.06.1324) which the auditor reviewed. Key points to note are:</p> <ul style="list-style-type: none"> • GAS.06.1324 provides a process for resource allocation against upcoming planned and unplanned works (work schedule). The final work schedule is approved by the Plant Manager, who has a budget allocation suitable to manage the annually scheduled works • An initial review of the outstanding work orders indicates that “close out” after work completion needs focus to reduce what appears in the backlog. • TEC Hedland are of the opinion that the budgeted staffing levels are adequate. However, with Covid-19 and general skill shortages in the resources sector staff recruitment and retention has been problematic. This has contributed to the quantity of backlogged work orders. <p>Actions:</p> <ol style="list-style-type: none"> 1. Review the backlog of work orders and manage as per GAS.06.1324. 2. TEC Hedland to review staffing and retention human resource strategies in line with current resource industry constraints and market conditions. 	<ol style="list-style-type: none"> 1. Adam McClea 2. Keith Adams 	<ol style="list-style-type: none"> 1. 31 December 2022 2. 31 December 2022

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2/2022	<p>Contingency Planning</p> <p><i>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</i></p> <p>TEC Hedland has an Emergency Management Policy and also a Standard. There are individual plans for crisis management, threat responses, communications plan and IT contingency. Under this, there are business unit plans for emergency response and continuity.</p> <p>Three-monthly emergency drills are undertaken at the SHPS. The Environmental Health and Safety team consult with the Plant Manager to decide the scenario to be tested and can also decide the drill scenario without input if considered required.</p> <p>The hierarchy of site drills to be undertaken is as follows:</p> <ul style="list-style-type: none"> – Tabletop exercise – Functional exercise – Full scale exercise <p>The review sighted examples of completed drills and exercises in 2020 and 2021 but not 2022.</p> <p>The O&M Site Supervisor raised concerns about the effectiveness of the procedure "GAS.02.1471 EMERGENCY PREPAREDNESS AND RESPONSE" for the Port Hedland region in relation to Department of Fire and Emergency Services (DFES) and Emergency Medical attendance availability and response times. This warrants an urgent requirement by TransAlta management to consider and schedule drills for the Port Hedland Operations to test effectiveness and identify any corrective actions. Besides, no proofs of Drills and Tabletop Exercises (TTX) conducted this year 2022 for TEC Hedland site were provided to the review, to establish compliance with the procedures. This requires corrective action.</p> <p>The reviewer also observed during the site visit that the O&M Site Supervisor was not familiar with the emergency response procedure for the site,</p>	<p>TransAlta to action suitable training for all their site personnel and contractors at SHPS to ensure their understanding of all aspects of TECH's procedure "GAS.02.1471 EMERGENCY PREPAREDNESS AND RESPONSE" has been achieved.</p> <p>TransAlta to complete Drills and Tabletop Exercises (TTX) at TEC Hedland site to establish compliance with the procedure GAS.02.1471 EMERGENCY PREPAREDNESS AND RESPONSE.</p> <p>TransAlta to develop and implement a schedule at SHPS to conduct Emergency Response Drills or Functional Exercises (FTX) that may involve the testing of a specific component of the emergency response plan and to undertake Full Scale Exercise (FSX) for testing the Department of Fire and Emergency Services (DFES) and Emergency Medical attendance availability and response times in the</p>	<p>For contextualizing the actions, it is worth noting that:</p> <ul style="list-style-type: none"> • TEC Hedland has developed and implemented an annual Emergency Response Drill programme with supporting documentation as per GAS.02.1471. • In compliance with GAS.02.1471, the emergency response drills: <ul style="list-style-type: none"> ○ for H1 CY2022 was completed on 25/05/2022. Evidence of this was unfortunately not provided to the auditors during the audit but has now been provided (post audit). ○ for H2 CY2022 was completed on 29/09/2022. • TEC Hedland utilise a TransAlta enterprise-wide electronic system (TSD or Total Safety Documents) for accessing, storing and updating procedures. A key feature of TSD is the ability to require specific individuals to read and acknowledge specific documents. <p>Actions:</p> <ol style="list-style-type: none"> 1. Check and verify that the Total Safety Documents database is setup for assigned personnel at TEC Hedland to review and acknowledge GAS.02.1471 (Emergency Preparedness and Response instructions) as well as GAS.02.1331 (South Hedland Emergency Response Plan). 2. Check and confirm that the frequency of emergency response drills is compliant with GAS.02.0471 (6-monthly). 	<ol style="list-style-type: none"> 1. Nigel Feletti 2. Nigel Feletti 	<ol style="list-style-type: none"> 1. 30 November 2022 2. 31 October 2022

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	which raised concerns relating to the effectiveness of new starter inductions and mandatory training.	event of a significant workplace emergency.	3. TEC Hedland in conjunction with the external stakeholders to schedule drill scenarios and functional exercises to specifically assess Port Hedland's local Emergency Services and Emergency Medical attendance, availability and response times.	3. Nigel Feletti	3. 31 January 2023